

JAP:DCW

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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M11-358

UNITED STATES OF AMERICA

- against -

COMPLAINT AND AFFIDAVIT
IN SUPPORT OF AN
APPLICATION FOR
ARREST WARRANT

PATRICK MURAT,

(18 U.S.C. § 1542)

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

ERIC K. KLAUSSMANN, being duly sworn, deposes and says that he is a Special Agent with the Department of State, Diplomatic Security Service ("DSS"), duly appointed according to law and acting as such.

On or about January 10, 2010, within the Eastern District of New York, the defendant, PATRICK MURAT, did willfully and knowingly make a false statement in an application for a passport with intent to induce and secure the issuance of a passport under the authority of the United States, for his own use, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws.

(Title 18, United States Code, Section 1542).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

1. I am a Special Agent with DSS and have been so for about 18 months. I am familiar with the facts and circumstances set forth below from my personal involvement in the investigation, my review of the investigative file and from reports of other law enforcement officers involved in the investigation.

2. On or about January 10, 2010, the defendant PATRICK MURAT applied for a United States Passport. On the application, form DS-11, the defendant provided a name of another person as his own and also submitted that person's social security number, date of birth and place of birth as his own. Specifically, the defendant stated that his name was Gerrad Anthony Pressley and that his place of birth was Brooklyn, New York.

3. The defendant filled out and submitted the application at the United States Post Office in Canarsie, Brooklyn, New York using the above mentioned information.

4. During the course of verifying the information provided by the defendant PATRICK MURAT, the United States

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

Department of State fraud prevention manager reviewed the defendant's passport application and found that it included a number of fraud indicators. For instance, the birth certificate and Connecticut state identification card submitted by the defendant had been issued less than one month before the defendant submitted his passport application. Additionally, it was determined that there was a Department of State passport hold on applications in the name of Gerrad Anthony Pressley. Based on the passport hold, a passport was not issued to the defendant pending further investigation.

5. Department of State Special Agents began an investigation concerning the passport application that was submitted in Brooklyn on or about January 10, 2010. As part of this investigation, Special Agents located Gerrad Anthony Pressley and confirmed that he did not submit the passport application in question. In fact, State Department records confirm that the real Gerrad Anthony Pressley has never applied for a passport.


6. Through witness interviews and further investigation, Special Agents determined that the person who was pictured in the passport application was the defendant PATRICK MURAT, a citizen of Haiti who had been previously deported from the United States in 2008. Notably, a witness told Special

Agents that he had seen MURAT in the United States as of December 2010, and knew that MURAT was trying to obtain a false passport.

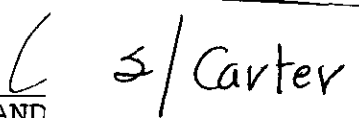
7. Special Agents obtained MURAT's photograph from the New York City Police Department and Immigration and Customs Enforcement and determined that these photographs matched the photograph that the defendant provided on the fraudulent passport application that was submitted in Brooklyn on or about January 10, 2010.

8. Further investigation revealed that on October 8, 2010, a passport application was submitted in the name of Lamont Joel Magwood in Philadelphia, Pennsylvania. The photograph submitted with this passport application also matched the defendant. Based on this match, a passport was not issued to the defendant.

WHEREFORE, your deponent respectfully requests that the defendant PATRICK MURAT be dealt with according to law.


ERIC K. KLAUSSMANN
Special Agent
Department of State

Sworn to before me this
6th day of April, 2011


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